

UNITED STATE DISTRICT COURT
DISTRICT OF MINNESOTA

Jeffery Burrige,

Case No: 06-4776 DWP/AG/S

Plaintiff,

v.

NOTICE OF REMOVAL

Zoll Medical Corporation,

Defendant.

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT
COURT OF MINNESOTA:

1. Petitioner/Defendant, Zoll Medical Corporation is a Defendant in an action commenced against them in Hennepin County District Court entitled Jeffery Burrige v. Zoll Medical Corporation, Court File No: _____. A true and correct copy of the Summons and Complaint served upon Petitioner is attached as Exhibit "A." No further proceedings have taken place in the state action.

2. Plaintiff Jeffery Burrige, is and at all relevant times was, according to the Complaint, a citizen of the State of Minnesota. Petitioner/Defendant Zoll Medical Corporation is a Massachusetts corporation with its principal place of business in Chelmsford, Massachusetts.

3. Diversity in citizenship exists in this action and the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs.

4. Based upon the foregoing, this Court has original jurisdiction for this matter pursuant to 28 U.S.C. § 1332(a)(1), and the entire matter is one which may be removed to this Court pursuant to 28 U.S.C. § 1441.

SCANNED

DEC 06 2006

U.S. DISTRICT COURT MPLS

5. The Summons and complaint in the state action were served on Petitioner/Defendant Zoll Medical Corporation on or about November 16, 2006, and Petitioner/Defendant has filed this Notice of Remove within thirty (30) days after service of the Summons and Complaint.

WHEREFORE, Petitioner/Defendant Zoll Medical Corporation prays that the state action pending against them be removed to this Court.

Dated: December 6, 2006.

MESHBESHER & SPENCE, LTD.

By 

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Minneapolis, MN 55404
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December 6, 2006

(VIA MESSENGER)

Clerk of Court
United States District Court
District of Minnesota
U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

RECEIVED
06 DEC - 6 AM 10:57
CLERK U.S. DIST. COURT
MINNEAPOLIS, MN

RE: Jeffery Burrige v. Zoll Medical Corporation
District Court File No:
Our File No: 23110/42499

Dear Clerk of Court:

Enclosed for filing in the above-reference matter, please find the following:

1. Notice of Filing of Notice of Removal;
2. Notice of Removal;
3. Civil Cover Sheet; and
4. Filing fee check in the amount of \$350.00.

Thank you for your assistance.

Very truly yours,

MESHBESHER & SPENCE, LTD.



Daniel J. Boivin

DJB/reb
Enclosures

cc: Clayton D. Haunen, Esq. (w/enclosures)